

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

FANEUIL HALL MARKETPLACE, LLC,)

Plaintiff,)

v.)

Civil Action No. 05-CV-11760-RGS

THOMAS E. BROWN and,)

STEPHANIE L. BROWN,)

Defendants.)

JOINT MOTION TO EXTEND DEADLINE
TO FILE RESPONSE TO MOTION TO DISMISS

NOW COME the parties to the above entitled action and hereby jointly move for an extension of time for the Plaintiff, Faneuil Hall Marketplace, LLC ("Faneuil Hall"), to file its response to the Motion to Dismiss of the Defendant, Stephanie L. Brown ("Brown").

In support of this Motion, the parties submit as follows:

1. On August 26, 2005, Brown filed a Motion to Dismiss under Rule 12(b)(2) of the Federal Rules of Civil Procedure asserting that this Court does not have personal jurisdiction over the Defendant.

2. Thereafter, the parties filed a Joint Motion to Extend Time within which Faneuil Hall must respond to the Motion to Dismiss in order to permit Faneuil Hall to conduct discovery of Brown, the co-guarantor, Thomas Brown, and one purported witness to the signatures, Edward Roberts.

3. On October 19, 2005, this Court issued an Order extending the time within which Faneuil Hall must respond to the Motion to Dismiss to January 17, 2006.

4. The co-guarantor, Thomas Brown, filed a Chapter 7 Petition for Bankruptcy in the

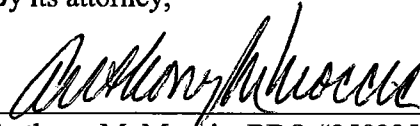
United States Bankruptcy Court for the District of New Hampshire, and the filing of that bankruptcy has delayed certain of the discovery.

5. The parties submit that one additional month will be necessary to complete the discovery and will provide sufficient time to permit Faneuil Hall to respond properly to the Motion to Dismiss.

WHEREFORE, the parties respectfully request that this Court enlarge the time within which the Plaintiff, Faneuil Hall Marketplace, LLC, must respond to the Motion to Dismiss of the Defendant, Stephanie Brown, through and including February 17, 2006.

FANEUIL HALL MARKETPLACE, LLC,

By its attorney,



Anthony M. Moccia, BBO #350225

ECKERT SEAMANS CHERIN & MELLOTT, LLC

One International Place

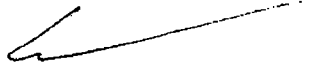
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STEPHANIE L. BROWN,

By her attorney,



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